

# BakerHostetler

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March 24, 2023

### VIA ECF

Honorable Kenneth M. Karas  
United States District Judge  
Southern District of New York  
300 Quarropas Street, Courtroom 521  
White Plains, New York 10601

*Re: Finn v. Empress Ambulance Services, Inc. d/b/a Empress EMS, Case No. 7:22-cv-08101-KMK (the "Finn Action")*

Dear Judge Karas:

As you know, we represent Defendant Empress Ambulance Service, LLC ("Empress") in the above-captioned *Finn* Action. Empress writes jointly with Plaintiff John Finn ("Plaintiff") pursuant to the Court's November 14, 2022 Order [Dkt. No. 17] requiring the parties to the *Finn* Action to submit joint status reports to the public docket providing updates on the progress of settlement negotiations every 14 days. The tenth status report is due today, March 24, 2023.

Since the parties' previous status report, they have continued to meet and confer and conduct diligent settlement negotiations. Specifically, the parties have been finalizing a plan to avoid jurisdictional objections and have been negotiating the final aspects of the settlement agreement.

The parties are close to finalizing the settlement terms and agreement. Therefore, we respectfully request that the Court continue to stay the later-filed actions during this process. The parties will continue working on the settlement during the next two weeks and, in accordance with the Court's November 14, 2022 Order, will provide another status update on April 7, 2023.

Honorable Kenneth M. Karas  
March 10, 2023  
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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Casie D. Collignon". The signature is fluid and cursive, with a long, sweeping horizontal stroke at the end.

Casie D. Collignon

cc: All counsel of record (via ECF)